

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

TEJA RAVI,)
)
Plaintiff,)
)
v.)
)
THE UNITED STATES,)
)
Defendant.)

No. 20-1237C
(Senior Judge Firestone)

CONSENT MOTION FOR ENLARGEMENT OF TIME TO FILE
SUPPLEMENTAL BRIEF IN SUPPORT OF OUR MOTION TO
DISMISS, OR IN THE ALTERNATIVE, MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 6.1 of the Rules of the United States Court of Federal Claims, defendant, the United States, respectfully requests an enlargement of time of seven days to file our supplemental brief in support of our motion to dismiss, or in the alternative, motion for summary judgment. Our brief is currently due today, June 25, 2021. If this motion is granted, our reply brief will be due on or before July 2, 2021. This is our first request for an enlargement of time for this purpose. Counsel for plaintiff offered her consent to this motion.

Good cause supports our request. As the Court is aware, this case involves an undercover law enforcement operation. Due to the nature of the case, any written submissions and relevant supporting materials that we intend to include with our filing must be vetted by agency officials at both the U.S. Immigration and Customs Enforcement and the Department of Justice prior to filing. Undersigned counsel has endeavored to complete the Government's submission in this matter without seeking an enlargement, but it is now clear that more time is necessary to ensure that the Government's interests are fully protected. Although we regret the suddenness of this

request, we believe that a seven day enlargement will be sufficient to finalize our brief in this case.

For these reasons, we respectfully request that the Court grant our consent motion for an enlargement of time of seven days, through and including July 2, 2021, within which to file our supplemental brief in this case.

Respectfully submitted,

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June 25, 2021

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on this 2nd day of July 2021, a copy of the foregoing “CONSENT MOTION FOR ENLARGEMENT OF TIME TO FILE SUPPLEMENTAL BRIEF IN SUPPORT OF OUR MOTION TO DISMISS, OR IN THE ALTERNATIVE, MOTION FOR SUMMARY JUDGMENT” was filed electronically. I understand that notice of this filing will be sent to all parties by operation of the Court’s electronic filing system. Parties may access this filing through the Court’s system.

s/ Meen Geu Oh